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March 9, 2022

Honorable Michael A. Shipp. U.S.D.J.  
United States District Court  
District of New Jersey  
Clarkson Fisher United States Court House  
402 East State Street  
Trenton, New Jersey 08625

**RE: *New Jersey Second Amendment Society, et al v. New Jersey Press Association, et al.***  
**Civil Action No. 20-5228 (MAS) (LGH)**

**Dear Judge Shipp:**

On December 14, 2021 I filed the plaintiffs' Second Amended Complaint and Jury Demand in the above matter. (**ECF Document 67**). Thereafter, defendants requested an extensive extension to file an Answer or otherwise plead which was granted by the Court giving defendants until February 22, 2022 to file their Answer or otherwise plead. (**ECF Document 71**). On February 24, 2022 defendants filed an 84 page *Rule* 12 motion to dismiss as their responsive pleading fixing March 21, 2022 as the return date for that motion. (**ECF Document 72**).

I write because I had surgical procedure on my back several days ago and have been out of the office. It will be sometime after that that I will be able to prepare and file the plaintiffs' formal Opposition Brief to this motion. While my staff can do certain things with me providing periodic instructions remotely via telephone, the drafting of this Opposition Brief is something that a secretary or paralegal cannot do. I must do this work myself, and at the moment I am temporarily unable to do so, and the earliest it is contemplated that I will be back to work full time will be sometime next week. As such, I would request an adjournment of both the return date and the date by which plaintiffs' opposition must be filed. Please advise at your earliest whether this request is granted or whether I have to have to file a formal motion.

Respectfully submitted,  
*/s/ Albert J. Rescino*  
**ALBERT J. RESCINIO, ESQ.**

AJR:ms

**cc: Thomas J. Cafferty, Esq.**  
**(DICTATED)**